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August 23, 2019

VIA ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write this Court to request a brief extension on Keith Raniere's deadline to file a third-party claim to the subject properties listed in the Preliminary Orders of Forfeitures. (See Dkts. 722, 739, 742, 758, 759, 760.) On July 22, 2019, the government provided notice to Mr. Raniere that he may have a legal interest in one or more assets which this Court has ordered to be forfeited to the United States. 21 U.S.C. § 853(n) allows thirty days for a third-party claimant to file a claim to any of the subject properties. Based on the July 22, 2019 mailing, the deadline to file a claim would be Monday, August 26, 2019.

We request a brief two-week extension until September 9, 2019 to review the Preliminary Orders of Forfeiture and determine whether Raniere intends to file a claim to any of the subject properties. Counsel reached out to the government yesterday, August 22, 2019, and AUSA Orenstein has not yet replied as to whether she objects to this extension.

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Thank you for your consideration.

Respectfully submitted,



Marc A. Agnifilo  
Teny R. Geragos

cc: Counsel for the government (via ECF)